

REMARKS

I. Introduction

In response to the Office Action dated May 6, 2005, claim 21 has been cancelled, claims 1, 10, and 11 have been amended, and claims 22-27 have been added. Claims 1-20 and 22-27 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Non-Art Rejections

In paragraphs (3) and (4) of the Office Action, claim 10 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicants have amended claim 10 to provide proper antecedent basis and overcome this rejection. Accordingly, Applicants submit that the rejection under 35 U.S.C. §112 is now moot.

III. Prior Art Rejections

In paragraph (6) of the Office Action, claim 21 was rejected under 35 U.S.C. §102 as being anticipated by Pham et al., U.S. Patent No. 6,629,145 (Pham). In paragraph (8) of the Office Action, claim 21 is further rejected under 35 U.S.C. §102(e) as being anticipated by Chen, U.S. Patent No. 6,553,423. Claim 21 has been cancelled.

In paragraphs (11)-(27) of the Office Action, claims 1, 3-11, and 13-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Pothapragada et al., U.S. Patent No. 6,389,432 (Pothapragada) in view of the Chen.

In paragraphs (28) and (29) of the Office Action, claims 2 and 12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Pothapragada and Chen as applied to claims 1 and 11, and further in view of Rosasco, U.S. Patent No. 6,317,137.

Specifically, independent claims 1 and 11 were rejected as follows:

As to claim 1, Pothapragada taught the invention substantially as claimed including image data processing apparatus, comprising a plurality of image processing systems (col. 2, lines 39-67) in which each of said image processing systems has direct access to a respective frame storage means (col. 1, lines 60-67, col. 2, lines 1-3, 39-53; figs. 1 and 16); and

a. A network connecting said image processing systems together so as to allow each connected image processing system to indirectly access the frame storage means of the other connected image processing systems (col. 1, lines 31-39, col. 5, lines 12-23); wherein

- i. Each image processing system includes a local configuration file specifying details of its respective locally connected storage means (col. 7, lines 1-14; registered attributes in lookup table), and
- ii. Network communication means (col. 7, lines 56-61).

Pothapragada did not specifically teach the image processing systems to include a network configuration data structure, and said network communication means is arranged to

- i. Transmit details of its associated configuration file to other networked image systems, and to
- ii. Add configuration data to its associated network configuration data structure in response to configuration details received from other networked image processing systems.

Chen taught a processing system to include a network configuration data structure (col. 4, lines 31-37), and a network communication means to transmit details of its associated configuration file to other networked image systems (col. 5, lines 13-16, 24-29, 50-55, col. 6, lines 17-38), and to add configuration data to its associated network configuration data structure in response to configuration details received from other networked image processing systems (col. 6, lines 17-20, 22-26). It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of Pothapragada and Chen because Chen's teaching of exchanging configuration file enables the processing systems of Pothapragada's apparatus to dynamically announce new, replace old and withdraw existing communication capabilities between the neighboring processing systems (col. 6, lines 17-20, 49-53).

Claim 11, Pothapragada taught the invention substantially as claimed including a method of automatically writing network configuration data structure in a networked image data processing environment, including a plurality of image processing systems (col. 2, lines 39-67) in which each of said image processing systems has direct access to a respective frame storage means (col. 1, lines 60-67, col. 2, lines 1-3, 39-53; figs. 1 and 16), wherein each image processing system includes a local configuration file specifying details of its respective locally connected storage means (col. 7, lines 1-14; registered attributes in lookup table), and network communication means (col. 7, lines 56-61); and a network connection said image processing systems together so as to allow each connected image processing system to indirectly access the frame storage means of the other connected image processing systems (col. 1, lines 31-39, col. 5, lines 12-23, col. 7, lines 56-61).

Pothapragada did not specifically teach the image processing systems to include a network configuration data structure, and said network communication means is arranged to

- a. Transmitting details of system configuration data to other network processing systems, and
- b. Adding configuration data to a local network configuration data structure in response to configuration details received from other networked image processing systems.

Chen taught a processing system to include a network configuration data structure (col. 4, lines 31-37), and a network communication means to transmit details of its associated configuration file to other networked image systems (col. 5, lines 13-16, 24-29, 50-55, col. 6, lines 17-38), and to add configuration data to its associated networked configuration data structure in response to configuration details received from other networked image processing systems (col. 6, lines 17-20, 22-26). It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of Pothapragada and Chen because Chen's teaching of exchanging configuration file enables the processing systems of Pothapragada's apparatus to dynamically announce new, replace old and withdraw existing communication capabilities between the neighboring processing systems (col. 6, lines 17-20, 49-53).

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Neither Pham nor Chen teach, disclose or suggest an image processing system;
- (2) Neither Pothapragada nor Chen teach, disclose or suggest frame storage means in an image processing system;
- (3) Neither Pothapragada, Chen, nor Rosasco teach, disclose or suggest a local configuration file that specifies details of a locally connected storage means;
- (4) Neither Pothapragada, Chen, nor Rosasco teach, disclose or suggest transmitting the details in the local configuration file to other networked image systems;
- (5) Neither Pothapragada, Chen, nor Rosasco teach, disclose or suggest other networked image systems adding local configuration details to a network configuration data structure, wherein the location configuration details are received from other networked image systems.
- (6) There is not suggestion or motivation to combine Rosasco with either Pothapragada or Chen.

Independent claims 1 and 11 are generally directed to image processing systems. The claims specifically provide for multiple image data processing systems that each have frame storage means. Accordingly, unlike merely networked computers, the claimed systems are specifically directed towards image processing and the storage of frames. The claims further provide that each image processing system has direct access to a particular frame storage means. The claims then provide the ability for each image processing system to indirectly access the frame storage means of another image processing system. To perform such indirect access, each system maintains two different types of components – (1) a local configuration file; and (2) a network configuration data structure. The local configuration file contains details of the locally connected frame storage means. The network configuration data structure maintains details from other image processing systems' local configuration file. Each image processing system is configured to send details from the location configuration file to other image processing systems. When the local configuration details are received from another networked image system, the image processing system automatically adds the details to the networked image data structure.

Accordingly, the system provides the ability to automatically update the network configuration data structure and thereby maintain information regarding all frame storage means on the network. Thus, when a request to access a particular frame arrives, the image processing system

merely looks to the network configuration data structure to find where the frame resides and may thereby request the appropriate access. Such an automated capability avoids the manual configuration issues that exist in the prior art.

In addition, new dependent claims 22-27 provide details regarding the content of the local configuration file and the network configuration data structure. Both the local configuration file and the network configuration data structure contain framestore and interface information. The local configuration file contains framestore information for the frames on the locally connected frame storage means and a listing of each interface that the image processing system is connected to. However, the network configuration data structure contains framestore information for all of the frame storage means controlled by image processing systems on the network. In addition, the network configuration data structure contains interface information for the fastest interface that each image processing system may communicate with the current image processing system over. Since only the one fastest interface is listed in the network configuration data structure, it may be understood that when the details of the local configuration file is received in an image processing system, the image processing system identifies the fastest common interface and adds that interface to the network configuration data structure.

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

Applicants first note that neither Pothapragada nor Chen even remotely describe image processing systems of frame storage means. In fact, separate electronic searches of both Pothapragada and Chen for the term "image" provides no results whatsoever. Without even mentioning the term "image", the references cannot possibly teach an image processing system. Further, neither Pothapragada nor Chen describe or remotely allude to frame storage means or storing frames in an image processing environment. Such a lack of teaching clearly distinguishes the references from the present invention and the present field of invention. Applicants note that under MPEP §2142 and 2143.03 "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." In the

present rejection, the image processing system and frame aspects of the invention are completely ignored. Accordingly, the Office Action fails to establish a prima facie case of obviousness.

In addition to the above, Applicants note that neither Pothapragada nor Chen even remotely describe the capability for each system to maintain both a local configuration file and a network configuration data structure that is automatically maintained. In this regard, the claims provide for each image processing system to maintain both components. For the local configuration file, the Office Action relies on the lookup table of Pothapragada. Applicants note that the lookup table is in the SAN manager and manages information for all storage devices on the network. Such a SAN manager is clearly differentiable and does not teach the image processing system of the invention wherein a frame storage means is directly attached to the image processing system and each image processing system maintains the local configuration file.

To Office Action admits that Pothapragada did not teach the network configuration data structure or the claim elements relating to transmission of such data. Instead, the Office Action relied on Chen to teach these elements. Again, as stated above, Chen does not even remotely allude to an image processing system or frame storage means both of which are specifically claimed. In addition, Applicants note that Chen completely fails to teach, disclose, or suggest, implicitly or explicitly, the transmission of a local configuration file (that has details regarding a locally connected storage means) to another networked system and adding such local configuration data to the network configuration data structure.

In rejecting these elements, the Office Action relies on Chen's routers and the transmission of a message regarding capabilities of the router (see col. 5, lines 13-16, 24-29, 50-55, col. 6, lines 17-38). However, such capabilities are not similar to transmitting details of a local configuration file. In fact, such a local configuration file does not exist in Chen. In addition, Chen merely teaches the transmission of router capabilities that comprises new features that may be supported by a peer router. As set forth in Chen, such capabilities include (i) a multiprotocol extension capability, and a (ii) route refresh capability (see col. 5, lines 41-50). Col. 5, lines 50-55 describes such extension and refresh capabilities. Namely, the extension capability allows GBP-4 to carry address families other than IPv4 unicast. Further, the refresh capability is used when a router changes its routing policy to advertise the ability of a router to receive a route refresh message from its neighbor. Such extension and refresh capabilities cannot and do not provide for sending details of a locally connected frame

storage means. In fact, such extension and refresh capabilities are not even remotely similar to such claimed data.

The claims further provide for adding the local data to the network configuration file. To teach these elements, the Office Action again relies on Chen's changing a router's capability. Again, updating a network configuration data structure with details regarding frame storage means from other image processing systems on a network (as claimed) is not even remotely similar to updating a router's capabilities so that peer routers may issue appropriate calls. To allege that Chen's router updates teaches the claimed addition of local configuration data extends beyond the field of Chen's invention and is illogical.

The Office Action continues and states that Pothapragada's dynamic announcement of new communication capabilities teaches the update of configuration information as claimed. However, the claims do not provide for updating communication capabilities. Instead, the claims provide for updating information regarding a frame storage means controlled by another image processing system. Details regarding a frames storage means are not taught, disclosed, suggested, or alluded to, implicitly or explicitly, by details regarding router communication capabilities between processing systems.

In addition to the above, Applicants submit that there is no suggestion to combine Rosasco with the either Pham, Chen, or Pothapragada. The MPEP §706.02(j) provides that "there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." However, there is no suggestion or motivation in the references themselves to add the teachings of Rosasco to Pham, Chen, or Pothapragada. In this regard, neither Chen or Pothapragada mention or even remotely hint at image processing systems. The Office Action asserts that Roasco's teaching would provide Pothapragada and Chen with the ability to process and access multiple requests for imaging and video data in real time. However, Chen and Pothapragada do not state the desire or intent to extend to imaging and video data. Further, there is no motivation or knowledge generally available to one of ordinary skill in the art to combine the references as asserted. Accordingly, Rosasco cannot be combined with the cited art.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Pham, Chen, Pothapragada, and Rosasco. In addition, Applicants' invention solves problems not recognized by Pham, Chen, Pothapragada, and Rosasco.

Thus, Applicants submit that independent claims 1 and 11 are allowable over Pham, Chen, Pothapragada, and Rosasco. Further, dependent claims 2-10, 12-20, and 22-27 are submitted to be allowable over Pham, Chen, Pothapragada, and Rosasco in the same manner, because they are dependent on independent claims 1 and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-10, 12-20, and 22-27 recite additional novel elements not shown by Pham, Chen, Pothapragada, and Rosasco.

IV. Conclusion

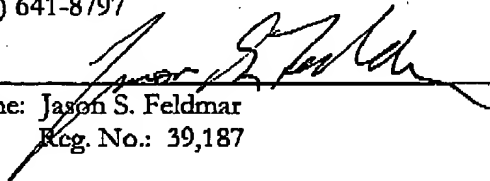
In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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IN THE DRAWINGS

Please amend FIG. 9 by adding arrows 921 and 922 as set forth to comply with the description set forth in paragraph [0084]. Replacement drawing sheet for FIG. 9 is attached hereto.